



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

ANILCA Implementation Program

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Diane Chung, Superintendent
Katmai National Park and Preserve
National Park Service
P.O. Box 7
King Salmon, AK 99613

Dear Ms. Chung:

The State of Alaska reviewed the supporting documentation for the Commercial Services Strategy, which will be used to inform the upcoming Katmai National Park and Preserve Backcountry Management Plan. According to the documentation, the backcountry plan will aid the park in managing visitor use within designated Wilderness. The following comments represent the consolidated views of state agencies.

We support the Service's efforts to engage commercial operators and the public in the development of a commercial services strategy, which will provide for long term protection of park resources while ensuring the public is afforded ample opportunities to experience Katmai National Park and Preserve. The Service may want to consider the potential benefits associated with implementing the final strategy in a commercial services plan instead of a backcountry management plan so that the strategy is applied consistently on a park-wide scale and in all future planning efforts.

We understand the recent meeting to engage commercial service providers was not well attended due to its timing during the peak summer visitor use season when commercial services in Katmai are most active. While the timing of the meeting was possibly unavoidable to take advantage of available resources, we request the Service schedule another meeting when commercial service providers are more likely available to attend and engage park staff directly. We assume the reason for their inability to attend the meeting would also apply to providing written comments; therefore, an additional comment opportunity is also warranted. The Park and Preserve is an important component of the local economy and input from commercial service providers, who are intimately familiar with on-going uses and park resources, is essential to ensure a successful strategy.

The 2006 National Park Service Management Policies identify the need for a commercial services strategy "...to ensure that concession facilities and services are necessary and appropriate, financially viable, and addressed in an approved management plan." The supporting documentation focuses on identifying "necessary and appropriate" commercial services and identifies Katmai-specific definitions. The definitions appear very general and do not specifically identify or refer to Katmai purposes and resources for which the park was established and managed, which would be reasonable to expect. If retained as Katmai-specific definitions, we recommend they be further refined to reflect Katmai's specific purposes and resources, as well as provisions in the Alaska National Interest Lands Conservation Act (ANILCA), which take into account the remote nature of the park and provide for allowances unique to Alaska's park units.

The 2006 policies recognize that concession operations are subject to provisions in ANILCA and implementing regulations at 36 CFR Part 36. ANILCA allows for motorized methods of access, such as airplanes, motorboats,

and snowmachines, to ensure Alaska's remote and expansive conservation system units, including designated wilderness, remain accessible for public use. ANILCA also allows for the continuation of visitor services that existed on or before January 1, 1979¹, and except for sport fishing and hunting guiding, provides a preference for Native Corporations and local residents for new visitor services.² ANILCA further allows for visitor facilities both within and outside park unit boundaries,³ and the continuation of existing uses and the future establishment and use of temporary facilities and equipment on all public lands where the taking of fish and wildlife is permitted.⁴ We request that these and any other applicable sections of ANILCA be given due consideration during the development of the commercial services strategy as well as the subsequent plan.

Visitors and Alaskan residents alike rely on experienced commercial service providers for safe and reliable access and enjoyment of park resources. We request the commercial services strategy not just identify providing opportunities for visitor use and enjoyment as a qualifying criterion for concession operations, but instead fully recognize their importance to realizing the purposes for which the park unit was established. This will also help to further the system's overall mission to provide for current and future public use and enjoyment of park resources. Without commercial operators, the majority of Alaska's park units, which are among the least visited units in the system, would be enjoyed by even fewer members of the public.

Thank you for this opportunity to comment. We look forward to participating in the further development of the commercial services strategy for Katmai. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,



Susan Magee
ANILCA Program Coordinator

¹ Section 1307(a) *"Notwithstanding any other provision of law, the Secretary, under such terms and conditions as he determines are reasonable, shall permit any persons who, on or before Jan. 1, 1979, were engaged in adequately providing any type of visitor services within any area established as or adding to a conservation system unit to continue providing such type of service and similar types of visitor services within such area if such service or services are consistent with the purposes for which such unit is established or expanded."*

² Section 1307(b) states that the Secretary *"(1) shall give preference to the Native Corporation which the Secretary determines is most directly affected by the establishment or expansion of such unit by or under the provisions of this Act; (2) shall give preference to persons whom he determines, by rule, are local residents;..."*

³ Section 1306(a) *"ESTABLISHMENT. – In conformity with the conservation and management plans prepared for each unit and the purposes of assuring the preservation, protection and proper management of any conservation system unit, the Secretary may establish sites and visitor facilities – (1) within the unit, if compatible with the purposes for which the unit is established, expanded, or designated by this Act, and the other provisions of this Act, or (2) outside the boundaries of, and in the vicinity of, the unit. To the extent practicable and desirable, the Secretary shall attempt to locate such sites and facilities on Native lands in the vicinity of the unit."*

⁴ Section 1316(a) *"On all public lands where the taking of fish and wildlife is permitted in accordance with the provisions of this Act or other applicable State and federal law the Secretary shall permit, subject to reasonable regulation to ensure compatibility, the continuance of existing uses, and the future establishment, and use, of temporary campsites, tent platforms, shelters, and other temporary facilities and equipment directly and necessarily related to such activities...."*